

222 DELAWARE AVENUE, SUITE 900
 P.O. BOX 25130
 WILMINGTON, DE 19899
 ZIP CODE FOR DELIVERIES: 19801

THE BAYARD FIRM

A T T O R N E Y S

FILED ELECTRONICALLY

 MERITAS LAW FIRMS WORLDWIDE

www.bayardfirm.com

302-655-5000

(FAX) 302-658-6395

WRITER'S DIRECT ACCESS

(302) 429-4208

rkirk@bayardfirm.com

August 21, 2007

The Honorable Vincent J. Poppiti
 Blank Rome LLP
 1201 Market Street, Suite 800
 Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd. v. ViewSonic, C.A. No. 04-343 JJF*

Dear Special Master Poppiti:

I write on behalf of LG.Philips LCD Co., Ltd. ("LPL") concerning the timing of any supplemental deposition of LPL. As discussed during the teleconference on August 17, 2007, LPL reserves all of its rights and objections, including, for example, LPL's right to appeal whether Defendants are entitled to further deposition testimony. For purposes of proceeding efficiently, we understand that LPL has preserved its right to appeal and that an appeal would be ripe as soon as the deposition topics are final, without awaiting a formal deposition notice or motion in response to a formal notice. If our understanding is incorrect, we would appreciate your guidance or clarification.

While we continue to believe that two full days of deposition (twenty-one additional hours with translation) is unnecessary, we respect Your Honor's strong recommendation to agree on that matter. LPL, therefore, will not challenge the two days (up to 21 hours) of deposition time that would apply to a supplemental deposition. We believe that this avoids the need for further hearings concerning the timing of the deposition. We are in the process of confirming with support personnel and we will, of course, address any issues that arise as promptly as possible.

Also, without waiving LPL's appeal rights concerning a further deposition of LPL, we would like to avoid unnecessary disputes as to timing. With respect to the timing of a supplemental deposition, we understood Your Honor to have concluded that any deposition should proceed the week of September 17, 2007. Assuming that the deposition goes forward, and without waiving any rights or objections, we have confirmed that LPL could make a witness available at our Washington, D.C. offices for deposition on September 19, 20, and 21, 2007. Although Mr. Bono remains unavailable during that time, we would, if necessary, make arrangements for other counsel to defend the deposition.

THE BAYARD FIRM

The Honorable Vincent J. Poppiti
August 21, 2007
Page 2

The remaining issues concerning any supplemental deposition are the finalized topics, and, given those topics, whether LPL intends to appeal regarding the continued deposition or its scope. Last night, we received Defendants' revised proposed topics, which we are currently reviewing. We intend to discuss the topics with Defendants' counsel as soon as possible and to report back to Your Honor regarding the topics.

Respectfully submitted,



Richard D. Kirk (rk0922)

cc: Counsel as shown on the attached certificate

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on August 21, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Jeffrey B Bove, Esq.	Frederick L. Cottrell, III, Esq.
James D. Heisman, Esq.	Anne Shea Gaza, Esq.
Jaclyn M. Mason, Esq.	Richards, Layton & Finger
Connolly Bove Lodge & Hutz LLP	One Rodney Square
1007 North Orange Street	P.O. Box 551
P.O. Box 2207	Wilmington, DE 19899
Wilmington, Delaware 19899-2207	

The undersigned counsel further certifies that copies of the foregoing document were sent by email and by hand on August 21, 2007 to the above counsel and were sent by email and by U.S. Mail on August 21, 2007 to the following non-registered participants:

Scott R. Miller, Esq.	Valerie Ho, Esq.
Connolly Bove Lodge & Hutz LLP	Mark H. Krietzman, Esq.
333 South Grand Avenue	Frank C. Merideth, Jr., Esq.
Suite 2300	Greenberg Traurig LLP
Los Angeles, CA 90071	2450 Colorado Avenue, Suite 400E
	Santa Monica, CA 90404

Tracy Roman, Esq.
Raskin Peter Rubin & Simon LLP
1801 Century Park East, Suite 2300
Los Angeles, CA 90067

/s/ Richard D. Kirk (rk0922)
Richard D. Kirk